

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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MEMORANDUM ENDORSED

December 19, 2024

By ECF

Honorable Gregory H. Woods
United States District Judge
Southern District of New York

Re: *United States v. Marco Cintron, 24 Cr. 495 (GHW)*

Dear Judge Woods:

I write to respectfully request that the Court modify Marco Cintron's bond to remove his curfew, while leaving in place his electronic monitoring condition. **Both the Government and Pretrial Services consent to this request.** As background, Mr. Cintron is charged with possession of a firearm after a felony conviction and unlawful delivery of firearms. He was released at his presentment on June 5, 2024, on a set of bond conditions including, as relevant, electronic monitoring with a curfew and travel restricted to EDNY/SDNY/DNJ. He has been compliant with all conditions. Mr. Cintron makes this request because his being subject to a curfew has resulted in his missing out on various personal and professional opportunities. The proposed modification would therefore allow him to take advantage of more of those opportunities while ensuring that he remains subject to GPS monitoring.

Thank you for your attention to this request.

Respectfully submitted,

/s/ Jonathan Marvinny
Jonathan Marvinny
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Application denied without prejudice. The application does not identify how the defendant's risk of flight or danger to the community have changed since his bail conditions were established. That the defendant's conditions of pretrial release have resulting in his "missing out on various personal and professional opportunities" does not, by itself justify a modification of the defendant's conditions of release. While informative, the consent of the Government and the Pretrial Services Office to the proposed modification is not dispositive.

cc: Getzel Berger, Esq.

Jonathan Lettieri, Pretrial Services

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 29.

SO ORDERED.
Dated: December 19, 2024
New York, New York


GREGORY H. WOODS
United States District Judge